

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

FINJAN SOFTWARE, LTD., an Israel  
corporation,

Plaintiff,

v.

SECURE COMPUTING CORPORATION,  
a Delaware corporation, CYBERGUARD,  
CORPORATION, a Delaware corporation,  
WEBWASHER AG, a German corporation  
and DOES 1 THROUGH 100,

Defendants.

Civil Action No. 06-369 GMS

**FINJAN'S PROPOSED VOIR DIRE QUESTIONS**

Pursuant to Local Rule 47.1, Plaintiffs Finjan Software Ltd. and Finjan Software, Inc.  
(collectively "Finjan") hereby submit the following proposed *voir dire* questions.

**I. Proposed Voir Dire Questions**

This is an action for patent infringement. The parties in this case are Finjan Software, Ltd., Finjan Software, Inc., Secure Computing Corporation, Cyberguard Corporation, and Webwasher AG. In this case, Secure Computing Corporation, Cyberguard Corporation, and Webwasher AG are accused of infringing Finjan's patents, and Finjan is accused of infringing Secure Computing's patents.

1. The trial is expected to last approximately 7 business days. Does the length of the trial present any special problem to any member of the panel?
2. Have you heard or read anything about this case?

3. Have you or any member of your immediate family ever had a personal or business relationship of any kind with any of these companies?
4. Do you have any opinions about a party in this case that would affect your ability to be a fair and impartial juror?
5. Do you own stock or have any financial interest in any of the parties?
6. Perkins Coie LLP and Potter, Anderson & Corroon LLP are counsel for Finjan in this case. Their attorneys include:
  - A. Philip Rovner
  - B. Paul J. Andre
  - C. Lisa Kobialka
  - D. Meghan Wharton
  - E. James Hannah
  - F. Zhuanjia Gu
  - G. Kris Kastens
  - H. Hannah Lee

Do you or any member of your immediate family know any of these attorneys involved in this case, or have you or any member of your immediate family had any relationship with or been employed by any of them or their law firms?

7. Robins, Kaplan, Miller & Ciresi LLP and Richards, Layton & Finger, P.A. represent Secure Computing Corporation, Cyberguard Corporation, and Webwasher AG in this case. Their attorneys include:
  - A. Frederick Cottrell III
  - B. Kelly Farnan

- C. Ronald Schutz
- D. Jake Holdreith
- E. Christopher Seidl
- F. Trevor Foster

Do you or any member of your immediate family know any of these attorneys involved in this case, or have you or any member of your immediate family had any relationship with or been employed by any of them or their law firms?

- 8. Have you or anyone in your immediate family ever participated in a lawsuit?
- 9. Do you have any reservations about serving on the jury in a case that will involve issues related to computer software or computer security?
- 10. Have you had any experience, either personal or through business, involving inventions or patents?
- 11. Do you believe companies frequently try to infringe or violate one another's patent rights?
- 12. Have you or any member of your immediate family ever been employed by the United States Patent and Trademark Office?
- 13. Do you hold any opinions about the United States Patent and Trademark Office that might keep you from being a fair and impartial juror?
- 14. Do you have any opinions about the relationship between patents and the public interest that might keep you from being a fair and impartial juror?
- 15. Do you know or are you familiar with any of the following prospective witnesses?
  - A. Giovanni Vigna

**B.** Matt Bishop  
**C.** Russell Parr  
**D.** Todd Heberlein  
**E.** Trent Jaeger  
**F.** Dan Wallach  
**G.** Carl Degen  
**H.** Christoph Alme  
**I.** Shlomo Touboul  
**J.** David Kroll  
**K.** Asher Polani  
**L.** Yigal Edery  
**M.** Nimrod Vered  
**N.** Yuval Ben-Itzhak  
**O.** Limor Elbaz  
**P.** Dan Frommer  
**Q.** Elizabeth Lally  
**R.** Frank Berzau  
**S.** Jan Schnellbacher  
**T.** John Vigourouz  
**U.** Paula Greve  
**V.** Peter Borgolte  
**W.** Roland Scholz  
**X.** Ron Kraistman  
**Y.** Steven Chew  
**Z.** Michael Gallagher

**AA.** Martin Stecher

**BB.** Sarah Kaye

**CC.** Matt Galligan

**DD.** Jill Putman

**EE.** Rick Kruse

**FF.** Ezra Sofer

**16.** Do you speak a foreign language?

**17.** Do you have any concerns about a company that was founded in Israel or a company based in Israel?

**18.** Do you have any concerns towards individuals who are Israeli citizens or whose native tongue is Hebrew?

**19.** Is there any additional information you would like to share with the court, attorneys, and parties to help them better learn of your background and experiences that might affect your ability to sit on the jury in this case?

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**CERTIFICATE OF SERVICE**

I, Philip A. Rovner, hereby certify that on January 7, 2008, the within document was filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following; that the document was served on the following counsel as indicated; and that the document is available for viewing and downloading from CM/ECF.

**BY HAND DELIVERY AND E-MAIL**

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I hereby certify that on January 7, 2008 I have sent by E-mail the foregoing document to the following non-registered participants:

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